



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ISRAEL BOLLAG, individually and on behalf of
all others similarly situated,

Plaintiff,

vs.

XINHUA FINANCE MEDIA LTD., FREDY BUSH,
SHELLY SINGHAL, J.P. MORGAN SECURITIES
INC., UBS AG, CIBC WORLD MARKETS CORP.
and WR HAMBRECHT & CO., LLC,

Defendants.

07 Civ. 3994 (LTS)

LEO YEN, individually and on behalf of all
others similarly situated,

Plaintiff,

vs.

XINHUA FINANCE MEDIA LTD., FREDY BUSH,
SHELLY SINGHAL, ZHU SHAN, GRAHAM
EARNSHAW, ALOYSIUS T. LAWN, JOHN H.
SPRINGER, ZHAO LI, LONG QIU YUN, J.P.
MORGAN SECURITIES, INC., UBS AG, CIBC
WORLD MARKETS CORP., and W.R.
HAMBRECHT & COMPANY, LLC.,

Defendants.

07 Civ. 4046 (LTS)

**JOEL DARRAS, individually and on behalf of
all others similarly situated,**

Plaintiff,

vs.

**XINHUA FINANCE MEDIA LTD., FREDY BUSH,
SHELLY SINGHAL, J.P. MORGAN SECURITIES,
INC., UBS AG, CIBC WORLD MARKETS CORP.,
and WR HAMBRECHT & CO.,**

Defendants.

07 Civ. 4144 (LTS)

**ALTON PARTNERS, on behalf of itself and
all others similarly situated,**

Plaintiff,

vs.

**XINHUA FINANCE MEDIA LIMITED, FREDY
BUSH and SHELLY SINGHAL,**

Defendants.

07 Civ. 4443 (LTS)

**BRICKMAN INVESTMENTS, on behalf of itself and
all others similarly situated,**

Plaintiff,

vs.

**XINHUA FINANCE MEDIA LTD., FREDY BUSH,
SHELLY SINGHAL, J.P. MORGAN SECURITIES,
INC., UBS AG, CIBC WORLD MARKETS CORP.,
and WR HAMBRECHT & CO.,**

Defendants.

07 Civ. 4719 (LTS)

**BLOOMFIELD, INC., on behalf of itself and
all others similarly situated,**

Plaintiff,

vs.

**XINHUA FINANCE MEDIA LTD., FREDY BUSH
and SHELLY SINGHAL, J.P. MORGAN SECURITIES
INC., UBS AG, CIBC WORLD MARKETS CORP.,
and W.R. HAMBRECHT & COMPANY, LLC,**

Defendants.

07 Civ. 4727 (LTS)

**JIAJU CHU, individually and On Behalf of All Others
Similarly Situated,**

Plaintiff,

vs.

**XINHUA FINANCE MEDIA LTD., FREDY BUSH
and SHELLY SINGHAL, J.P. MORGAN SECURITIES
INC., UBS AG, CIBC WORLD MARKETS CORP.,
and W.R. HAMBRECHT & CO.,**

Defendants.

07 Civ. 6145 (LTS)

STIPULATION AND ORDER

IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for the undersigned parties to the captioned actions, that:

1. The Complaints in each of the above-captioned actions have been served upon each Defendant and Defendants hereby accept service of the above captioned complaints pursuant to FRCP 4. Defendants hereby reserve all of their rights, defenses and/or objections to the Complaint with the exception of objecting to service of process which is specifically waived. Nothing herein shall be construed to be an admission or acceptance of service in any action other than the above-captioned actions;

2. Defendants' time to move, answer or otherwise respond to the Complaints is extended without date;

3. Lead plaintiff will file and serve a Consolidated Amended Complaint within 60 days after entry of the Court's order appointing a lead plaintiff and designating lead counsel; and

4. a. Defendants will serve and file their response to the Consolidated Amended Complaint within 60 days of the service thereof;

b. In the event that Defendants move to dismiss the Consolidated Amended Complaint, lead plaintiff will file and serve opposition papers within 60 days of service of the motion; and

c. Defendants will file and serve reply papers, if any, within 45 days after service of lead plaintiff's opposition papers.

5. Any and all pretrial conferences scheduled in the above-captioned actions are hereby adjourned *sine die* until after entry of the Court's order appointing a lead plaintiff and designating lead counsel.

Dated: New York, New York
July __, 2007

BERNSTEIN LIEBHARD & LIFSHITZ, LLP

By: Timothy MacFall
Sandy A. Liebhard (SL 0835)
Timothy MacFall (TM 8639)
Gregory M. Egleston (GE 1932)

10 East 40th Street, 22nd Floor
New York, New York 10016
(212) 779-1414

Attorneys for Plaintiffs

KAHN GAUTHIER SWICK, LLC

By: Kim E. Miller
Michael A Swick (MS 9976)
Kim E. Miller (KM 6996)

12 East 42nd Street, 12nd Floor
New York, New York 10017
(212) 696-3730

Attorneys for Plaintiffs

**WILSON SONSINI GOODRICH & ROSATI
PROFESSIONAL CORPORATION**

By: Gideon A. Schor
Douglas Clark (DC 8309)
Gideon A. Schor (GS 5932)

1301 Avenue of the Americas, 40th Floor
New York, New York 10019
(212) 497-7753

*Attorneys for Defendants
Xinhua Finance Media Ltd., Fredy Bush, Shelly
Singhal, Zhu Shen, Graham Earnshaw, Aloysius T.
Lawn, John H. Springer, Zhao Li, and Long Qiu
Yun*

CLIFFORD CHANCE US LLP

By: Mark Holland
Mark A. Kirsch (MK 7806)
Mark Holland (MH 6949)
Angelique Shingler (AS 6052)

31 West 52nd Street
New York, New York 10019
(212) 878-8000

*Attorneys for Defendants JP Morgan Securities
Inc., UBS AG, CIBC World Markets Corp., and
W.R. Hambrecht Co. LLC*

LERACH, COUGHLIN, STOIA, GELLER
RUDMAN & ROBBINS LLP

By: David A. Rosenfeld
Samuel H. Rudman (SR 7957)
David A. Rosenfeld (DR 7564)

58 South Service Road, Suite 200
Melville, NY 11747
(631) 367 7100

Attorneys for Plaintiffs

ZWERLING, SCHACHTER & ZWERLING, LLP

By: Richard A. Speirs
Richard A. Speirs (RS 8872)
Shaye J. Fuchs (SF 9412)

41 Madison Avenue
New York, New York 11747
(212) 223-3900

Attorneys for Plaintiffs

BRODSKY & SMITH LLC

By: Evan J. Smith
Evan J. Smith (ES-3254)

240 Mineola Boulevard
Mineola, New York 11501
(516) 741-4977

Attorneys for Plaintiffs

KAPLAN FOX & KILSHEIMER LLP

By: Frederic S. Fox *FF*
Robert N. Kaplan (RN 3100)
Frederic S. Fox (FF 9102)
Linda P. Nussbaum (LN 9336)
Jeffrey P. Campisi (JC 7264)

805 Third Avenue, 22nd Floor
New York, New York 10022
(212) 687-1980

Attorneys for Plaintiffs

GLANCY BINKOW & GOLDBERG LLP

By: Lionel Z. Glancy *LG*
Lionel Z. Glancy
Michael Goldberg

1801 Avenue of the Stars, Suite 311
Los Angeles, California 90067
(310) 201-9150

Attorneys for Plaintiffs

SO ORDERED:

[Signature] 7/23/2007
U. S. D. J. *m*